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Attorneys for Defendant, THE GEO GROUP, INC.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE that defendant THE GEO GROUP, INC., hereby removes to this Court the State Court action described below.

1. On September 21, 2011, an action was commenced in the Superior Court of the State of California in and for the County of San Diego, Central Division, entitled JEMAYA HUDSON, Plaintiff (hereinafter "Plaintiff"), vs. THE GEO GROUP, INC., a Florida Corporation, and Does 1 to 100, Inclusive, Defendants, as Case Number 37-2011-00098161-CU-OE-CTL (the

1 "Action). A true and correct copy of the Complaint is attached hereto as Exhibit "A".

2. THE GEO GROUP, INC., was first served with a copy of said Complaint on
3 September 26, 2011, when their Registered Agent was served by a process server. A true and
4 correct copy of the Proof of Service of Summons and Complaint transmittal is attached hereto as
5 Exhibit "B".

6. THE GEO GROUP, INC., is informed and believes that Plaintiff was, at the time she
7 filed the Action, and still is, a citizen of the State of California.

8. Defendant THE GEO GROUP, INC., first learned that the amount in controversy
9 exceeded \$75,000 when it was served with the Summons and Complaint in this Action on
10 September 26, 2011, within 30 days of the date of this filing. Within her Complaint, Plaintiff prays
11 for compensatory damages, including loss of earnings, severe mental anguish and emotional distress
12 and punitive damages. A true and correct copy of the Complaint is attached hereto as Exhibit "A".

13. This action is a civil action of which this Court has original jurisdiction
14 under 28 U.S.C. §1332, and is one which may be removed to this Court by defendant
15 pursuant to the provisions of 28 U.S.C. §1441(a) in that it is a civil action between citizens of
16 different states and the matter in controversy exceeds the sum of \$75,000, exclusive of interest and
17 costs.

18. THE GEO GROUP, INC., was, at the time of the filing of this action, and still is, a
19 citizen of the State of Florida, incorporated under the laws of the State of Florida, with its principal
20 place of business in Florida. The California Secretary of State identifies THE GEO GROUP, INC.,
21 as a Florida Corporation with its Registered Agent as Corporate Creations Network Inc., located at
22 131-A Stoney Circle, Suite 500, Santa Rosa, California 95401, on its website. A corporate filing
23 report request on Lexis reflects THE GEO GROUP, INC., as a Florida Corporation with its
24 Registered Agent as John Bulfin, located at 621 NW 53rd Street, Boca Raton, Florida, 33487, on
25 Lexis. True and correct copies of search results for THE GEO GROUP, INC. on those websites are
26 attached hereto as Exhibit "B".

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1 7. THE GEO GROUP, INC., is the only named defendant; the other defendants in this
2 action are fictitiously named, designated as Does 1 to 100, and their citizenship shall not be
3 considered in determining diversity jurisdiction. 28 U.S.C. §1441(a).

4 8. This Notice of Removal is filed with this Court within 30 days after
5 THE GEO GROUP, INC., received the Summons and Complaint (Exhibit "A") from which it was
6 first ascertained that the case was removable. THE GEO GROUP, INC., did not learn that the
7 amount in controversy exceeded \$75,000 until the Summons and Complaint were served on
8 September 26, 2011. Therefore, this removal is timely as required by 28 U.S.C. §1446(b) which
9 specifically provides, "The notice of removal of a civil action or proceeding shall be filed within
10 thirty days after the receipt by the defendant, through service or otherwise, of a copy of the initial
11 pleading setting forth the claim for relief upon which such action or proceeding is based, or within
12 thirty days after the service of summons upon the defendant if such initial pleading has then been
13 filed in court and is not required to be served on the defendant, whichever period is shorter." 28
14 U.S.C. § 1446 (b).

15 9. Pursuant to 28 U.S.C. §1446(a), true and correct copies of all process,
16 pleadings, and orders sent to and received by THE GEO GROUP, INC., in the State Court action are
17 attached hereto.

18
19 Dated: October 26, 2011

MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP

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21 By: /s/ Tracie L. Childs
22 Tracie L. Childs
23 Attorneys for Defendant,
24 THE GEO GROUP, INC.
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DECLARATION OF TRACIE L. CHILDS

I, TRACIE L. CHILDS, declare and state as follows:

1. That I am an attorney at law, duly licensed to practice before all of the courts of the State of California and the United States District Court, Southern District of California, and I am a Partner in the law firm of Manning & Kass, Ellrod, Ramirez, Trester LLP, attorneys of record for defendant, THE GEO GROUP, INC. I have personal knowledge of the facts stated herein, and if called as a witness, I could and would competently testify to them.

2. Attached hereto as Exhibit A and incorporated as if fully set forth herein is a true and correct copy of the Summons and Complaint in the matter of JEMAYA HUDSON, Plaintiff vs. THE GEO GROUP, INC., and Does 1 to 100, Inclusive, Defendants, as Superior Court Case Number 37-2011-00098161-CU-OE-CTL..

3. Summons and Complaint in this matter were served on Defendant THE GEO GROUP, INC., on September 26, 2011, through their agent for service of process, Corporate Creations. Copy of Proof of Service will be filed and served upon receipt.

4. Attached hereto as Exhibit B and incorporated as if fully set forth herein are search results from the California Secretary of State and Lexis corporations search, respectively.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 26, day of October, 2011, in San Diego, California.

/s/ Tracie L. Childs

TRACIE L. CHILDS

1 Name

2 THE GEO GROUP, INC

Connection or Interest

Defendant, may be liable
for plaintiff's injuries

4 Dated: October 26, 2011

5 **MANNING & KASS**
ELLROD, RAMIREZ, TRESTER LLP

6 By: /s/ Tracie L. Childs
7 Tracie L. Childs
8 Attorneys for Defendant,
9 THE GEO GROUP, INC.

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